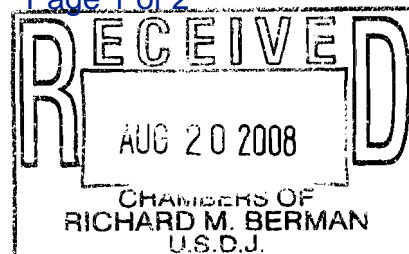
**FRIEDMAN & JAMES LLP**

ATTORNEYS AT LAW
132 NASSAU STREET
SUITE 900
NEW YORK, NY 10038

(212) 233-9385
FAX (212) 619-2340
www.friedmanjames.com



BERNARD D. FRIEDMAN
JOHN P. JAMES
ANDREW V. BUCHSBAUM

NEW JERSEY OFFICE
200 CRAIG ROAD
MANALAPAN, NJ 07726
(732) 431-1078

MEMO ENDORSED**BY HAND**

Honorable Richard M. Berman
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 650
New York, New York 10007

August 20, 2008

*Application granted. Conference adjourned
to 12/23/08 at 9:30 a.m.*

SO ORDERED:

Date: 8/21/08

Richard M. Berman
Richard M. Berman, U.S.D.J.

Re: Lamuel Wilson v. The City of New York
Civil Action No.: 08 CV 0994

Honorable Sir:

We represent plaintiff Lamuel Wilson in the above entitled Jones Act matter. We write jointly with defendant's attorney Anshel David, Esq. to request a ninety (90) day adjournment of the discovery end date of September 19, 2008. For the reasons set forth below, the parties respectfully request that the Court extend discovery to December 19, 2008 and schedule a Settlement Conference for a date thereafter convenient to the Court.

Plaintiff sustained injuries to his left wrist and right knee when in the course of his employment as a deckhand, he tripped on the deck of the defendant's vessel. The Initial PreTrial Conference was held approximately two months after plaintiff's injury. At the time the parties appeared at the conference, and the discovery schedule was set, the parties were unaware of the full extent of plaintiff's injuries. In particular, we were unaware that plaintiff would be required to undergo right knee surgery for among other things a tear of the right medial meniscus. The surgery was performed in early July 2008.

At the present time, plaintiff continues to undergo physical therapy to rehabilitate his injured left wrist. He recently began physical therapy after surgery to rehabilitate the right knee.

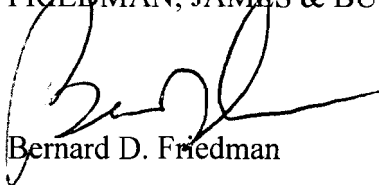
We have been in contact with plaintiff's treating physicians Salvatore Lenzo, M.D. and Jeffrey S. Kaplan, M.D. who are treating plaintiff for the wrist and knee injuries respectively. In view of the fact that plaintiff's rehabilitation is ongoing, the doctors are not able at this time to offer a prognosis regarding the permanency of Mr. Wilson's injuries and his ability to return to work as a deckhand in the future. It is anticipated that plaintiff will reach maximum medical improvement sometime late fall 2008. At that time, the City of New York will conduct its medical evaluation of plaintiff so that meaningful settlement negotiations can be held. The parties have had great success in the past settling Jones Act claims.

There have been no previous requests by the parties for an extension of time to complete discovery. The parties will continue to work on settlement as directed by the Court in paragraph xi of the Case Management Plan. A Revised Case Management Plan is enclosed for the Court's consideration.

Thank you.

Respectfully yours,

FRIEDMAN, JAMES & BUCHSBAUM LLP



Bernard D. Friedman

BDF:ll
Enclosure

cc: **VIA FAX: (212) 788-8887**
Anshel David, Esq.
New York City Law Department
(w/enclosure)